OSBORN LAW, p.c.

43 West 43<sup>rd</sup> Street, Suite131 New York, New York 10036 USDC SDNY
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DANIEL A. OSBORN LINDSAY M. TRUST TELEPHONE 212 - 725 - 9800

FACSIMILE 212 - 500 - 5115

January 30, 2021

## **VIA ECF**

Honorable Robert W. Lehrburger United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

> Re: *Arch v. Commissioner of Social Security,* Civil Action No. 1:20-cv-02842-VSB-RWL

Dear Judge Lehrburger,

We write on behalf of plaintiff, Nicole Arch, and with the consent of the defendant to request a 14-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is currently due on **February 2, 2021**. Plaintiff respectfully requests an extension of time up to and including, **February 16, 2021**. This is plaintiff's second request for an extension of time.

Subject to the approval of the Court, the parties propose the following amended briefing schedule:

Honorable Robert W. Lehrburger January 30, 2021 Page 2

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **February 16, 2021**;
- b. Defendant to serve its response/cross-motion on or before **April 14, 2021**; and
- c. Plaintiff to serve her reply (if any) on or before May 8, 2020.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn OSBORN LAW, P.C. 43 West 43<sup>rd</sup> Street, Suite 131 New York, New York 10036

Telephone: 212-725-9800 Facsimile: 212-500-5115 dosborn@osbornlawpc.com

cc: Heetano Shamsoondar, Esq. (by ECF)

SO ORDERED:

2/1/2021

HON. ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE